



# DELTA STEWARDSHIP COUNCIL

*A California State Agency*

980 NINTH STREET, SUITE 1500  
SACRAMENTO, CALIFORNIA 95814  
HTTP://DELTACOUNCIL.CA.GOV  
(916) 445-5511

November 9, 2017

**Chair**  
Randy Fiorini

Christina Sloop  
Department of Fish and Game  
830 S Street  
Sacramento, CA 95811

**Members**  
Frank C. Damrell, Jr.  
Patrick Johnston  
Susan Tatayon  
Skip Thomson  
Ken Weinberg  
Michael Gatto

**Executive Officer**  
Jessica R. Pearson

Via e-mail: [Christina.Sloop@Wildlife.ca.gov](mailto:Christina.Sloop@Wildlife.ca.gov)

Dear Ms. Sloop:

Thank you for the opportunity to review the Public Draft of the Delta Conservation Framework (DCF). Council staff have enjoyed working with Department of Fish and Wildlife Staff as you developed this Framework and look forward to continued collaboration to improve ecosystem health of the Delta.

As we have mentioned in previous comments submitted and several in-person communications, we are supportive of a document that outlines a common vision for a sustainable Delta and we know how difficult this endeavor can be. We acknowledge the significant Delta community outreach you conducted during development of the DCF.

As with our previous comments submitted on the "partner draft", our comments reflect our review on several levels-clarify, accuracy and consistency with the Delta Plan and the Delta Reform Act, as well as readability of the DCF. While some of those previous comments were incorporated in the public draft, we noticed that many of our comments and suggestions were not reflected in this current draft. We ask that you please take another look at the comments we submitted in August (cover letter attached), as those remain important to us in fully supporting the document. Specifically, we are looking to the DCF to move ecosystem conservation strategies beyond the status-quo for the Delta and be foundational in our current efforts to amend Chapter 4 of the Delta Plan. To achieve this objective, we recommend that the DCF improve clarity on how to move the ecological baseline of the Delta past the goals and objectives of existing programs and projects, which are primarily aimed at addressing permitting requirements of existing or planned water and flood infrastructure, to projects focused on enhancing the ecosystem functions.

---

*"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."*

– CA Water Code §85054

With these thoughts in mind, please consider the overarching comments provided below, primarily focused on improving the organization, flow, and readability of the DCF. You have mentioned you expect to be utilizing the services of a technical editor as you finalize the DCF. We expect many of these suggestions to be addressed during this process. Specific, more detailed comments compiled from Council staff review are included in the attached documents.

Document Organization:

Describe the document's purpose and intended use up front. A really good description of Purpose is currently in Section 6. Suggest moving it into Section 1. Suggest moving most of Section 6 to the front of the document to set the tone and give the reader a better explanation of what this document is. For example, the text below would be useful to have upfront in Section 1 to provide context for the reader:

*The Delta Conservation Framework serves as a high-level conservation planning framework through 2050, with a landscape-scale focus across the entire Delta, Suisun Marsh, and Yolo Bypass. It is closely aligned with previous and ongoing efforts to coordinate and plan conservation in the Delta and provides goals and implementation strategies with objectives to guide the development of Regional Conservation Strategies by Regional Conservation Planning Partnerships (Regional Partnerships).*

Suggest reorganizing the DCF to provide historical context before jumping into issues and big concerns of landowners with conservation. For example, move Section 3 before Section 2.

In Regional Strategies chapters, consider reformatting to improve readability of the specific projects included in each region. For example use the following, or other appropriate headings to describe the different projects: Name; Owner; Acreage; Elevation; Opportunities; Constraints. Include an additional short description as necessary.

Document Tone:

Focus the document on desired outcomes (see list below). Reframe discussions to focus on what needs to/should be done to move forward with Conservation taking into account the human element.

*To implement the suite of overarching goals, the Delta Conservation Framework suggests strategies focused on:*

- 1. Conducting an open, collaborative partnership planning process with representation from all sectors and interests;*
- 2. The integration of conservation planning and socioeconomic factors, particularly recreation and agriculture;*

3. *A shift from a focus on single species toward improving the underlying processes of functioning ecosystems that in turn provide species habitat and ecosystem services;*
4. *Improving the implementation and long-term management of conservation projects through permitting processes that increase efficiency and save costs; and*

In (current) Section 2 remove references to “what we heard at the public workshops”. Instead, frame what was said as challenges. These challenges are currently well documented in Section 1. *Input from the Stakeholder Community*. Consider reframing the discussion to focus on the *process* in developing this document and keep the details of specific stakeholder comments in the appendices.

Document Content:

With respect to Appendix V, we look forward to working with you prior to the final release of the document to ensure that what is stated in Appendix V is in alignment with our current approach to Amendment to Chapter 4 of the Delta Plan.

With respect to integration between the sections, it is still challenging to understand how the sections are integrated and inform goals/strategies/objectives. For example, the topic of climate change and sea level rise (CC/SLR) is featured Section 4, but does not appear to inform Section 2 explicitly in terms of the Conservation Opportunity Regions (CORs). For example, how do CC/SLR projections inform selection of the long-term restoration efforts and CORs in Section 6? What are the implications for the Central Delta Corridor Partnership given the Griggs et al 2017 projections and spatial resources by CalAdapt?

The document still seems too long. Possibly pick representative examples to illustrate the target message within each chapter and put the rest in the Appendices.

Once again, thank you for the opportunity to review this initial draft of the DCF. Please see the attached files for detailed comments and suggested technical edits. Council staff look forward to working with you as you continue to refine this document, and to receive your input as we move forward with the Amendment to Chapter 4 of the Delta Plan.

Sincerely,



Terri Gaines  
Delta Stewardship Council

Attachments